

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ASSOCIATED RECOVERY, LLC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:15-cv-01723-AJT-JFA
)	
JOHN DOES 1-44,)	
)	
<i>Defendants in rem.</i>)	

MOTION TO SET ASIDE DEFAULT JUDGMENT

Shenzhen Jia Tai Zhe Technology Company (“JTZ”) and Defendant JTZ.com, pursuant to Federal Rule of Civil Procedure 60(b), hereby request to set aside the Judgment entered on May 18, 2016 (ECF 43). Pursuant to Local Civil Rule 7(E), counsel for Defendant called Plaintiff’s counsel in an attempt to meet and confer in good faith with Plaintiff regarding this Motion on June 9, 2016. At the time of this filing, counsel for Plaintiff did not consent to this Motion.

The basis for this motion is set forth more fully in the accompanying Memorandum in Support of Motion to Set Aside the Default Judgment.

WHEREFORE, Defendant respectfully requests that the Court grant this Motion and set aside the Judgment entered on May 18, 2016 (ECF 43) and order Uniregistrar Corp., the current registrar of the JTZ.com domain name, to take all steps within its power to transfer the domain back to JTZ.

Dated: June 14, 2016

Respectfully submitted,

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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 14th day of June 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Dated: June 14, 2016

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